

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL;  
24-mc-00353-LJL

**DECLARATION OF  
KENNETH A. CARUSO**

KENNETH A. CARUSO hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and the sole member of Kenneth Caruso Law LLC. I am lead counsel for Defendant, Rudolph W. Giuliani (“Defendant”), in both 24-cv-06563-LJL (the “Homestead Action”) and 24-mc-00353-LJL (the “Turnover Proceeding”).

2. I submit this Declaration, in accordance with S.D.N.Y. Local Rule 1.4, to provide proof of service on the client, Defendant.

3. On November 13, 2024, before publicly filing the motions to withdraw as counsel, I sent an email to Defendant, informing him of the motions to withdraw.

4. Attached to that email, I provided Defendant with:

- a. A copy of the motions to seal;
- b. An unredacted/unsealed copy of my Declaration; and
- c. An unredacted/unsealed copy of Mr. Labkowski’s Declaration.

5. In that email, I also explained that the two Declarations would be filed under seal.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on November 14, 2024

By: /s/ Kenneth A. Caruso  
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*Attorneys for Defendant,  
Rudolph W. Giuliani*